

## REMARKS

Upon entry of the foregoing Amendment, claims 4, 13-25, 27-39, and 49-61 are pending in the application. Claims 4, 13-25, 27-39, and 49-61 have been amended. Claims 26, 40-48, and 62 have been cancelled. No claims have been newly added. Applicant believes that this Amendment does not add new matter. In view of the foregoing Amendment and the following Remarks, allowance of all the pending claims is requested.

### EXAMINER INTERVIEW

Applicant thanks Examiner England for granting Applicant's representative the courtesy of a personal Examiner Interview on August 3, 2009. During the Examiner Interview, Applicant's representative discussed potential amendments to the claims in light of the Board Decision, as set forth below in further detail.

### BOARD DECISION

#### A. CLAIM 4

The Board has affirmed the Examiner's rejection of previously pending claim 4 under 35 U.S.C. § 103 as allegedly being obvious over U.S. Patent No. 6,304,892 to Bhoj et al. ("Bhoj") in view of U.S. Patent No. 6,249,755 to Yemini et al. ("Yemini"). Applicant notes that independent claim 4 has been amended as indicated above, and submits that Bhoj and Yemini do not render obvious currently pending claim 4 for at least the reason that the references relied upon, either alone or in combination, fail to disclose, teach, or suggest each and every feature of the claimed invention, as amended.

More particularly, Bhoj and Yemini, either alone or in combination, do not disclose, teach, or suggest at least the feature of "determining a first value for a first subset of the monitored component parameters in a first domain of the plurality of domains of the network and a second value for a second subset of the monitored component parameters in a second domain of the plurality of domains of the network" and "executing one or more data mining algorithms that discover a first influence that the first subset of component parameters have

on the service parameter from the first value and a second influence that the second subset of component parameters have on the service parameter from the second value,” as recited in amended independent claim 4, for example.

Rather, as the Board acknowledged, “Bhoj describes that in independently administered control domains of a network, the system administrator in one control domain is not able to access another control domain to detect problems in that control domain, or to measure service performance of the other data service system unless the system administrator is given access to the other control domain.” Board Decision, page 9. In contrast, independent claim 4 has been amended to further clarify, among other things, that determining a cause of a change in the state of a service includes “determining a first value for a first subset of the monitored component parameters *in a first domain* of the plurality of domains of the network and a second value for a second subset of the monitored component parameters *in a second domain* of the plurality of domains of the network.”

Accordingly, for at least the reason that Bhoj describes a system in which local systems have “an abstract view of the underlying data service system . . . that is independent of the underlying implementation” (col. 11, lines 25-54), Bhoj does not disclose, teach, or suggest determining respective values for respective subsets of a plurality of monitored component parameters in different domains of a network. In particular, because Bhoj indicates that various “plug-ins *hide the details* of the underlying data service system and the measurement protocols from the service manager” (col. 11, lines 25-54) (emphasis added), Bhoj cannot determine values for various component parameters that reside in different domains due to the fact that the details for such component parameters are hidden from the service manager.

Yemini fails to cure the foregoing deficiencies of Bhoj for at least the reason that Yemini does not disclose, teach, or suggest techniques that may be used to remove or otherwise avoid abstractions that hide the details of underlying systems that reside in different domains of a network in order to determine values for component parameters that reside in the different domains. For example, Board acknowledges that “Bhoj does not describe ‘when the state of the service changes, determining a cause of the change in the state of the service,’” but alleges that “Yemini describes a method for determining the source of a problem in a complex system

of managed components.” Board Decision, page 16. However, the Board’s allegations in this regard presuppose that the managed components described in Yemini can be accessed in order to determine respective values for component parameters that measure performances of the managed components.

Thus, Yemini fails to cure the foregoing deficiencies of Bhoj for at least the reason that Bhoj cannot employ the techniques described in Yemini to determine values for component parameters across different domains of a network. In particular, Bhoj cannot employ the problem diagnosis techniques described in Yemini because Bhoj relates to a system in which the details of underlying components that support a particular service across different domains of a network are abstracted and therefore hidden from the service manager that would be responsible for such problem diagnosis.

Accordingly, for at least the foregoing reasons, Bhoj and Yemini, either alone or in combination, fail to disclose, teach, or suggest each and every feature of amended independent claim 4. Thus, Applicant requests that the Examiner withdraw the rejection of this claim for at least the foregoing reasons.

**B. CLAIMS 13-17, 19-35, 37-53, AND 55-62**

The Board has affirmed the Examiner’s rejection of previously pending claims 13-17, 19-35, 37-53, and 55-62 under 35 U.S.C. § 103 as allegedly being obvious over Yemini, Bhoj, and U.S. Patent No. 6,052,722 to Taghadoss (“Taghadoss”). Applicant initially notes that claims 26, 40-48, and 62 have been cancelled as indicated above, and therefore the rejection has been rendered moot with respect to these claims. In addition, Applicant further notes that independent claims 13, 27, and 49 have been amended as indicated above, and submits that Yemini, Bhoj, and Taghadoss do not render obvious currently pending claims 13-17, 19-25, 27-35, 37-39, 49-53, and 55-61 for at least the reason that the references relied upon, either alone or in combination, fail to disclose, teach, or suggest each and every feature of the claimed invention, as amended.

More particularly, for at least the reasons discussed above, Yemini and Bhoj, either alone or in combination, do not disclose, teach, or suggest at least the feature of “determining

a first value for a first subset of the monitored component parameters in a first domain of the plurality of domains of the network and a second value for a second subset of the monitored component parameters in a second domain of the plurality of domains of the network" and "executing one or more data mining algorithms that discover a first influence that the first subset of component parameters have on the service parameter from the first value and a second influence that the second subset of component parameters have on the service parameter from the second value," as recited in amended independent claim 4, and as similarly recited in amended independent claims 13, 27, and 49, for example.

Taghadoss fails to cure the foregoing deficiencies of Yemini and Bhoj for at least the reason that Taghadoss generally relates to a system in which "[s]tate changes are propagated between the individual entities [in a network]," wherein each of the individual entities "determines whether its own state is affected" in response to receiving a state change notification" (Abstract). Thus, to the extent that Taghadoss can be properly combined with Yemini and Bhoj, which Applicant does not concede, Taghadoss would only provide capabilities for network entities to determine internal state changes. However, Taghadoss does not disclose, teach, or suggest determining values for component parameters that reside in different domains of a network to determine a cause of a change in the state of a service.

Accordingly, for at least the foregoing reasons, Yemini, Bhoj, and Taghadoss, either alone or in combination, fail to disclose, teach, or suggest each and every feature of amended independent claims 13, 27, and 49. Claims 14-17, 19-25, 28-35, 37-39, 50-53, and 55-61 depend from and add features to one of amended independent claims 13, 27, and 49. Thus, Applicant requests that the Examiner withdraw the rejection of these claims for at least the foregoing reasons.

### C. CLAIMS 18, 36, AND 54

The Board has affirmed the Examiner's rejection of previously pending claims 18, 36, and 54 under 35 U.S.C. § 103 as allegedly being obvious over Yemini, Bhoj, Taghadoss, and U.S. Patent No. 6,233,449 to Glitho et al. ("Glitho"). Applicant notes that independent claims 13, 27, and 49 have been amended as indicated above, and submits that Yemini, Bhoj, Taghadoss,

and Glitho do not render obvious currently pending claims 18, 36, and 54 for at least the reason that the references relied upon, either alone or in combination, fail to disclose, teach, or suggest each and every feature of the claimed invention, as amended.

More particularly, for at least the reasons discussed above, Yemini, Bhoj, and Taghadoss, either alone or in combination, do not disclose, teach, or suggest at least the feature of “determining a first value for a first subset of the monitored component parameters in a first domain of the plurality of domains of the network and a second value for a second subset of the monitored component parameters in a second domain of the plurality of domains of the network” and “executing one or more data mining algorithms that discover a first influence that the first subset of component parameters have on the service parameter from the first value and a second influence that the second subset of component parameters have on the service parameter from the second value,” as recited in amended independent claim 4, and as similarly recited in amended independent claims 13, 27, and 49, for example.

Glitho fails to cure the foregoing deficiencies of Yemini, Bhoj, and Taghadoss for at least the reason that Glitho generally relates to a system in which an “operation and maintenance control point (OMCP) operates at an intermediate level in a telecommunications network between the network elements and the network management system” (Abstract). However, in the context of the alleged combination with Yemini, Bhoj, and Taghadoss, the OMCPs described in Glitho would only provide abstracted views of the network elements underlying each intermediate level at which the OMCPs operate. As such, Glitho does not disclose, teach, or suggest techniques that may be used to remove or otherwise avoid abstractions that hide the details of underlying systems that reside in different domains of a network.

Accordingly, for at least the foregoing reasons, Yemini, Bhoj, Taghadoss, and Glitho, either alone or in combination, fail to disclose, teach, or suggest each and every feature of amended independent claims 13, 27, and 49. Claims 18, 36, and 54 depend from and add features to one of amended independent claims 13, 27, and 49. Thus, Applicant requests that the Examiner withdraw the rejection of these claims for at least the foregoing reasons.

## CONCLUSION

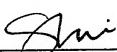
Having addressed each of the foregoing issues decided by the Board, it is respectfully submitted that a full and complete response has been made to the outstanding Board Decision. As such, the application is in condition for allowance. Notice to that effect is respectfully requested.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Date: August 24, 2009

Respectfully submitted,

By:

  
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Syed Jafar Ali  
Registration No. 58,780

PILLSBURY WINTHROP SHAW PITTMAN LLP  
P.O. Box 10500  
McLean, Virginia 22102  
Main: 703-770-7900  
Direct: 703-770-7540  
Fax: 703-770-7901